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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CATHY L. DIFRANCO,
Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

Case No. 2:19-cv-00896-APG-VCF

**JOINT STIPUATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL/REMAND.**

(SECOND REQUEST)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Reversal/Remand be extended from November 14, 2019 to **December 10, 2019**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) was out on intermittent sick leave due to a recent change in health and was out last week due to a family emergency of her immediate family member that required hospitalization. In addition, Counsel also has over 100+ active social security matters, which require two more dispositive motions until mid-November, and three pending Ninth Circuit matters which require multiple levels of review. Due to

1 unanticipated leave and heavy caseload, Counsel needs additional time to adequately review the
2 transcript and properly respond to Plaintiff's Motion for Summary Judgment. The parties further
3 stipulate that the Court's Scheduling Order shall be modified accordingly. Defendant makes this
4 request in good faith with no intention to unduly delay the proceedings. Counsel apologizes for the
5 belated request, but made her request as soon as reasonably practicable following her leave.
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7 Respectfully submitted,

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9 Dated: November 14, 2019

/s/ David Chermol
(*as authorized by email on November 14, 2019)
DAVID CHERMOL
Attorney for Plaintiff

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12 Dated: November 14, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

18
19 **~~PROPOSED~~ ORDER**

20 **APPROVED AND SO ORDERED:**

21 November 15, 2019
22 DATED: _____



THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPUATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL/REMAND.**

on the date and via the method of service identified below:

5 **ECF Notice:**

6 David F. Chermol
7 Chermol & Fishman, LLC
8 11450 Bustelton Ave
9 Philadelphia, PA 19116
10 215-464-7200
11 Fax: 215-464-7224
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Attorneys for Plaintiff

Respectfully submitted this 14th day of November 2019,

17 /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant United States Attorney
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